

4. Mr. Goodman is an individual consumer currently residing in Lawrence County, Indiana.

5. Riexinger & Associates LLC is a law firm incorporated in the State of Georgia who collects debts nationwide including the State of Indiana. Riexinger & Associates has a principal office located at 3100 Breckinridge Dr., Suite 722, Duluth.

6. Defendant regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another.

7. Riexinger & Associates LLC is a debt collector as defined by 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

8. During the approximate time period of April, 2010 through July 24, 2010, Defendant by an agent has made numerous phone calls to Plaintiff, Kay Goodman, mother of Plaintiff, Kevin Goodman, regarding an alleged consumer debt due and owing another.

9. During this time period, Plaintiff, Kevin Goodman, received numerous phone calls from Defendant and has continued to receive phone calls from Defendant regarding the alleged debt.

10. Defendant through its' agents have been told to cease calling Plaintiff, Ms. Goodman.

11. In fact, Defendant possesses Plaintiff, Mr. Goodman's telephone number, and have called Mr. Goodman regarding the alleged debt.

12. In fact, Plaintiff, Ms. Goodman has told them to take her out of Defendant's phone system.

13. Defendant has refused and continues to call, and stated during communication with Ms. Goodman, "Whenever he answers his phone they would stop calling."

14. Despite having Plaintiff's contact information, Defendant chose this path of conduct in violation of the Fair Debt Collection Practices Act.

VIOLATIONS OF THE FDCPA BY DEFENDANT

15. Defendant has violated 15 U.S.C. §1692b.

16. Defendant has violated 15 U.S.C. §1692c.

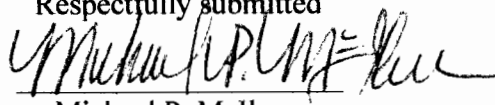
17. Defendant has violated 15 U.S.C. §1692d.


18. Defendant has violated 15 U.S.C. §1692e.

19. Defendant has violated 15 U.S.C. §1692f.

WHEREFORE, plaintiffs request that the Court enter judgment in their favor against the Defendant for:

1. The maximum amount of statutory and actual damages provided under the FDCPA.
2. Attorney's fees, litigation expenses and costs.
3. Such other and further relief as is appropriate.

Respectfully submitted
By 
Michael P. McIlree

JURY DEMAND

Plaintiffs demand trial by jury.

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VERIFICATION

I declare that the above referenced statements are true and accurate to the best of my knowledge and belief.


KAY GOODMAN, Plaintiff

VERIFICATION

I declare that the above referenced statements are true and accurate to the best of my knowledge and belief.


KEVIN GOODMAN, Plaintiff